

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

LESTER LEE,

PLAINTIFF

v.

BROOKSIDE PARK CONDOMINIUM,  
INC., METROPOLIS (aka MCM, INC.),  
RAMMY AZOULAY AND LAMONT  
SAVOY

DEFENDANTS

Case No. 8:24-cv-01205-TJS

**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka  
MCM, INC.), AND RAMMY AZOULAY'S OPPOSITION TO PLAINTIFF'S MOTION  
FOR EXTENSION OF TIME TO OPPOSE MOTIONS TO COMPEL AND MOTION  
FOR SUMMARY JUDGMENT**

COMES NOW, Defendants Brookside Park Condominium, Inc., Metropolis (aka MCM, Inc.), and Rammy Azoulay (Collectively "Brookside"), through their attorneys Anthony D. Dwyer and Eccleston and Wolf, P.C., respectfully submits the following Opposition to Plaintiff's Motion for an Extension of Time to file an opposition to the Motion to Compel and Motion for Summary Judgment. The interrogatories and document requests for were served in August, the motion to compel was filed on 2/20/25. The response is long overdue. Ms. Huh promised answers by email 2/24/25. Exhibit 1, which were not forthcoming. Not a single document has been produced and discovery is now closed. Defendant has been prejudiced.

Defendant also opposes the request for an extension of time to oppose the pending summary judgment. The request for more time comes after the response to the motion was already

overdue. Plaintiff's counsel is working with cocounsel, but she has not entered appearance. The motion should be deemed conceded.

### **MEMORANDUM OF POINTS AND AUTHORITIES**

Local Rule 105 – 2(a)

“All motions must be filed within the deadline set by the court.”

*Cohen v. Bd. of Trustees of Univ. of D.C.*, 307 F.R.D. 287 291 (D.D.C. 2014) (invoking DC Local Rule 7(b) to grant the motion to dismiss on the grounds that its merits were unopposed and thus conceded by plaintiffs).

### **CONCLUSION**

For all of these reasons, plaintiff's motion for an extension of time to oppose the motion to compel and the motion for summary judgment should be denied.

Respectfully submitted,

/s/Anthony D. Dwyer

Anthony D. Dwyer (415575)

Eccleston & Wolf, P.C.

Baltimore-Washington Law Center

7240 Parkway Drive, 4th Floor

Hanover, MD 21076-1378

(410) 752-7474 (phone)

(410) 752-0611 (fax)

E-mail: [dwyer@ewva.com](mailto:dwyer@ewva.com)

*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7<sup>th</sup> day of April 2025, copies of the foregoing **DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), AND RAMMY AZOULAY'S OPPOSITION TO PLAINTIFF'S MOTION FOR MORE TIME TO RESPOND TO MOTION TO COMPEL AND MOTION FOR SUMMARY JUDGMENT** were served by first-class mail, postage prepaid to:

Richard Bruce Rosenthal, Esq.  
545 E. Jericho Turnpike  
Huntington Station, NY 11746  
631.629.8111 (Phone  
[richard@thedoglawyer.com](mailto:richard@thedoglawyer.com)  
*Pro Hac Vice*

Michela Huth, Esquire  
Email only: [michelahuth.esq@gmail.com](mailto:michelahuth.esq@gmail.com)

/s/Anthony D. Dwyer  
Anthony D. Dwyer (415575)